

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES PRACTICES,
AND PRODUCTS LIABILITY
LITIGATION

No. 3:16-md-02738-MAS-RLS

MDL No. 16-2738 (MAS) (RLS)

**[PROPOSED] ORDER GRANTING
DEFENDANTS' MOTION TO
COMPEL DEPOSITION
TESTIMONY OF PAUL HESS AND
FOR SANCTIONS**

THIS MATTER having been brought before the Court by Defendants Johnson & Johnson and LLT Management LLC ("Defendants") for an order granting Defendants' Motion to Compel Deposition Testimony of Paul Hess and For Sanctions; and the Court having considered the moving papers; and for good cause shown;

IT IS on this _____ day of _____, 2024 hereby

ORDERED that Defendants' motion to compel is GRANTED. It is further hereby **ORDERED** that:

1. A deposition of Mr. Hess shall take place within one week of the date of this order.
2. Defendants' reasonable attorney's fees and expenses incurred in

preparing for and taking the deposition of Mr. Hess are awarded to Defendants.

3. Plaintiffs shall not be permitted to rely on any testing where Mr. Hess served as the analyst.

HON. JOEL SCHNEIDER, SPECIAL MASTER